



Homeland Security

February 8, 2005

MEMORANDUM FOR: Senior Administrative Services Officers

FROM: Donald G. Bathurst
Chief Administrative Officer

SUBJECT: Environmental Management Systems Self-Declaration
Protocol for Appropriate Facilities

Purpose

By Presidential Executive Order, the heads of Federal agencies are responsible for ensuring that all necessary actions are taken to integrate environmental accountability into agency decisionmaking and planning processes. This integration is to cross all agency missions, activities, and functions in the form of strategies that are established to support environmental leadership programs, policies, and procedures. That same Presidential Executive Order also requires that those strategies be explicitly and actively endorsed by agency senior level managers. Department of Homeland Security (DHS) Management Directive 5120.1, "Environmental Management Program," requires all appropriate DHS facilities to implement an Environmental Management System (EMS) by December 31, 2005. This memorandum provides additional guidance regarding self-declaration protocols for those systems.

Background

Self-declaration protocols outline procedures for ensuring the credibility of each appropriate facility EMS. These procedures are set forth by the EMS Self-Declaration Protocol memorandum issued by the White House Office of the Federal Environmental Executive (OFEE) on January 27, 2004, and under the authority of Executive Order 13148, "*Greening the Government Through Leadership in Environmental Management*" (both are available at www.ofee.gov).

The EMS self-declaration is more than an internal evaluation. It is a declaration to interested parties and stakeholders that confirms a facility's EMS is in place and is current. Self-declaration protocols are designed to satisfy the following principles:

- Produce accurate and reliable information on each DHS Organizational Element's (OEs) progress as improved practices associated with EMS implementation are adopted.
- Focus initial EMS verification and on-going quality assurance responsibility at the appropriate organizational level which is best informed about the facility.
- Provide sufficient flexibility to implement EMS in ways that support the mission of each OE.
- Provide a means for verifying the status of a facility EMS, and appropriately communicating that status to internal and external entities.
- Ensure that EMS verification is more than a documentation review, and that the effectiveness of EMS implementation is evaluated.
- Use existing EMS elements where possible so that self-declaration becomes an integral part of the facility's operation.

Examples of self-declaration protocols may be found on the OFEE website at: <http://www.ofee.gov/ems/training/SelfDeclarationProtocol.pdf> . You may find that the National Aeronautic and Space Administration's (NASA) Environmental Functional Review Checklist works well for your facilities.

Regardless of the EMS model chosen, (e.g., Code of Environmental Management Principles, ISO 14000, etc.) the following requirements for EMS self-declaration must be met:

1. At a minimum, internal EMS reviews need to be conducted annually.
2. Each OE shall establish qualifications and training requirements for internal and external EMS reviewers. External reviewers mean reviewers from outside the scope of the EMS in question (e.g., reviewers from another OE). However, for purposes of this protocol, reviewers may be from inside the same OE, but must be outside the covered EMS.
3. External reviews need to be conducted, at a minimum and where appropriate, every three years to determine the effectiveness of EMS implementation.
4. Self-declaration may be completed at the appropriate facility, the regional level (civil engineering unit, sector, etc.) or at the OE headquarters level. If completed below the OE HQ level, a copy of the self-declaration shall be forwarded to the OE Environmental Executive. The self-declaration should indicate which protocol was followed in making the determination. (Note: Appropriate facilities should have completed at least one full EMS cycle, including Management Review, before completing a self-declaration.)
5. Each OE shall include appropriate guidance to ensure that facilities desiring to participate in a Federal or state EMS recognition program (e.g., National

Environmental Performance Track, Oregon Green Permits Program, New Jersey Silver Environmental Performance Track, etc.) reflect the respective requirements in their self-declaration procedures. OEs may also adopt other EMS recognition programs (e.g., International Standards Organization, National Sanitary Foundation, etc.). Such EMS recognition obtained by a facility will be considered as fulfilling the requirements of EMS self-declaration as long as the EMS recognition remains current.

Action

Each OE must transmit to the Office of the Administrative Services the following statement, signed by the OE Environmental Executive:

“As the (OE Environmental Executive), I verify that the following list of OE facilities have environmental management systems in place. Furthermore, I verify that all provisions of the OE’s EMS criteria have been completed and were reviewed by me and senior management.”

This statement will become part of the submission of the OE’s annual Calendar Year Executive Order 13148 Report (normally due to OSEP in mid-February).

For additional information or assistance, please contact Bill McGovern of the Office of Safety and Environmental Programs at (202) 692-4225 or bill.mcgovern@dhs.gov.

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